

m/023/004

ASH GROVE CEMENT COMPANY


Western Region
P.O. Box 51
Nephi, Utah 84648
435-857-1212

RECEIVED

MAR 01 2001

**DIVISION OF
OIL, GAS AND MINING**

February 28, 2001

D. Wayne Hedberg
Permit Supervisor
Department of Natural Resources
1594 North Temple, Suite 1210
Box 145801
SLC, Utah 84114-5801

RE: Response to questions generated from review of Revised Notice of Intention to Commence Large Mining Operations leading to re-submittal of NOI, Ash Grove Cement Company, Leamington Mine, Permit No. M/023/004, Juab County, Utah

Dear Mr. Hedberg,

The attached pages represent our revisions to the figures, map, and text contained within our Notice of Intention (NOI) to Revise Large Mining Operations Leamington Plant and Quarry previously submitted to you on June 27, 2000. These revisions are in response to your review and corresponding letter dated October 6, 2000.

For your information we have included a summary response sheet to each issue raised by the Division in your letter dated October 6, 2000. The complete response is contained within the modified and re-submitted sections of the NOI. Please follow the directions below for updating your NOI submittal:

1. Remove and destroy the Cover Sheet, Table of Contents, List of Figures, List of Tables, List of Drawings, and List of Appendices. Replace with attached papers of same titles.
2. Completely remove the section behind the tab labeled R647-4-105 and replace with the attached papers of the same section number.
3. Remove and destroy Figure 4-106.9-1 (titled Geologic Cross-Section A-A') & Figure 4-106.9-3 (titled Geologic Cross-Section B-B') from behind the tab labeled R647-4-106 and replace with the attached papers of the same title.
4. Remove and destroy the section behind the tab labeled R647-4-109 and replace with the attached papers of the same section number.
5. Remove and destroy the section behind the tab labeled R647-4-110 **KEEPING** Table 4-110-2-1 (titled Rock Fragmentation Size – Combined Shale Results) & Table 4-110-2-2 (titled Rock Fragmentation Size – Combined Limestone Results). Replace with the attached papers of the same section number **inserting** Table 4-110-2-1 into page 110-3 and Table 4-110-2-2 into page 110-4.
6. Remove and destroy the section behind the tab labeled R647-4-111 and replace with the attached papers of the same section number.

7. Remove and destroy the section behind the tab labeled R647-4-112 and replace with the attached papers of the same section number.
8. Remove and destroy the section behind the tab labeled R647-4-113 **KEEPING** in place the Division Form MR-RC. Replace with the attached papers of the same section number.
9. Remove and destroy the map behind the tab in section 6 of the appendices (titled Reclamation Activities & Treatment Proposed Area to be Reclaimed and Revegetated) and replace with the attached map of the same title.
10. Remove and destroy the maps behind the tab in section 7A, 7B, 7C, 7D, 7E, & 7F of the appendices (**do not** discard the map in section 7 titled Drainage Control).

If you have any questions or need additional information please call me or Alan Finch at (435) 857-1212.

Regards,


Duane Crutchfield
Plant Manager

Cc: Alan Finch, Engineering Department
Charlie Nichols, AGC Overland Park Office
File

**SUMMARY RESPONSE TO STATE DIVISION QUESTIONS
DATED OCTOBER 6, 2000**

**Ash Grove Cement Company
Leamington Mine**

**M/023/004
February 28, 2001**

Heading numbers used in this response should match those contained in division response letter.

R647-4-105 – Maps, Drawings & Photographs

105.3.11 Regraded slopes to be left at steeper than 2H:1V (DJ)

The contradictive statements made in the narrative text have been changed. Waste rock disposal area will be regarded if slopes exceed 2H:1V.

105.3.14 Maps identifying surface areas which will be disturbed, but will not be reclaimed (DJ)

- A. Competent Limestone highwalls remain unreclaimed.
- B. No sediment ponds will remain. All will be reclaimed.
- C. Proposed New Pond will be reclaimed.
- D. Surface Diversion Structures will be reclaimed
- E. North Access Road is clearly identified on Reclamation Treatment Map
- F. South Access Road is clearly identified on Reclamation Treatment Map

105.3.17 Reclamation Activities and Treatment Map (DJ)

Map legend has been corrected. Further clarification in the narrative text has been given for quarries A, B, C, F, & H. Map legend has been modified to show itemization of non-revegetated acreage. New Reclamation and Treatment Map was submitted

R647-4-106 – Operation Plan

106.9 Location & Size of ore, waste, tailings, ponds (DJ)

Previous drawings showing cross-section A-A' and B-B' were incorrect. New drawings were made and submitted.

R647-4-109 – Impact Assessment

109.1 Impacts to surface & groundwater systems (TM)

All sediment ponds and associated diversion structures will be removed and reclaimed as part of the reclamation plan.

109.1 Slope stability, erosion control, air quality, safety (DJ)

Ongoing studies of pit highwalls will become part of the pit design plan. Previous drawings (sect. A-A' & sect. B-B') showing a 200 ft limestone wall resting upon the S3 formation & other highwalls in 'unidentified' materials were incorrect. Corrected drawings have been submitted. Also, the operator has committed to further study our current highwall design and will submit all results to the Division..

R647-4-110 – Reclamation Plan

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed (DJ)

Narrative has been modified to better explain extent of reclamation. Methods for highwall and endwall reclamation are given.

110.3 Description of facilities to be left (post mining use) (DJ)

No facilities will remain after final closure.

110.5 Revegetation planting program (LK)

Use of commercial fertilizer has been replaced with the use of compost manure. Wyoming big sagebrush has been added to re-vegetation seed mix.

R647-4-112 – Variance

Rule R647-4-111 – Reclamation Practices

111.2 Reclamation of natural channels (TM)

Narrative (and surety estimate) has been modified to show that no sediment ponds will remain as part of the post mining land use. Variance is no longer necessary.

111.9 Dams & impoundments left self draining & stable (TM)

Narrative (and surety estimate) has been modified to show that no sediment ponds will remain as part of the post mining land use. Variance is no longer necessary.

111.7 Highwalls (DJ)

As previously indicated drawings showing section A-A' and B-B' were incorrect. All 63 degree highwalls are in the L3 and L4 formations. Further studies as recommended by Dr. Ben Seegmiller will become part of an ongoing pit design program. All results will be shared with the division and changes to current pit design (if required) must have division approval first.

R647-4-113 – Surety (TM)

The surety estimate has been updated to reflect the changes made. The costs for reclamation of the N. and S. Access roads & commercial fertilizer were removed; costs for sediment pond reclamation and compost manure were added.